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*Lead Counsel for the  
Indirect Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. CV-07-5944-JST;  
No. CV-13-03234-JST

MDL No. 1917

**CLASS ACTION**

This Document Relates to:  
All Indirect Purchaser Actions

**INDIRECT PURCHASER PLAINTIFFS'  
RESPONSE TO ORDER RE: OBJECTION TO  
EX PARTE COMMUNICATIONS AND IN  
CAMERA REVIEW OF BILLING RECORDS**

Date: April 19, 2016  
Time: 2:00 p.m.  
Judge: Honorable Jon S. Tigar  
Court: Courtroom 9, 19th Floor  
Special Master: Martin Quinn (JAMS)

**REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED**

In accordance with the Order Re: Objection to Ex Parte Communications and In Camera Review of Billing Records (ECF No. 4508) (“Order”), and the Clarification Order Re Order Re Objection to Ex Parte Communications and In Camera Review of Billing Records (ECF No. 4522), Lead Counsel for the Indirect Purchaser Plaintiffs (“IPPs”) attaches hereto as Exhibits 1-6, the following communications relating to the submission of IPP Counsel’s confidential time and expense records for *in camera* review by the Special Master:

EXHIBIT	DOCUMENT
1	December 2, 2015 Letter from Mario N. Alioto to Special Master Quinn
2	December 2, 2015 Email from Lauren C. Capurro to Special Master Quinn <sup>1</sup> [filed partially under seal]
3	January 7, 2016 Email from Lauren C. Capurro to Special Master Quinn <sup>2</sup>
4	January 7, 2016 Email from Lauren C. Capurro to Special Master Quinn [filed partially under seal]
5	January 8, 2016 Email from Special Master Quinn to Lauren C. Capurro and Mario N. Alioto
6	January 9, 2016 Email from Lauren C. Capurro on behalf of Mario N. Alioto to Special Master Quinn

<sup>1</sup> In Lead Counsel’s Response to the Order to Show Cause Re: Objections to Ex Parte Communications (ECF No. 4469), Lead Counsel listed a second December 2, 2015 email from Lauren Capurro to Special Master Quinn containing the password necessary for downloading IPP Counsel’s time records. However, we have discovered that there was not in fact a second email to the Special Master because a password was not necessary for the Dropbox containing IPP Counsel’s time records.

<sup>2</sup> In Lead Counsel’s Response to the Order to Show Cause Re: Objections to Ex Parte Communications (ECF No. 4469), it stated that this email contained “the link . . . for downloading Exhibits 1 and 2 to the [January 7, 2016 letter], and the expense receipts and other backup materials received from IPP Counsel.” The January 7, 2016 email does not, in fact, contain a link. The Dropbox folder containing Exhibits 1 and 2 and the expense backup was sent to the Special Master directly from Dropbox. The link to access this Dropbox folder is:

Exhibits 1 and 2 to the January 7, 2016 letter and IPP Counsel’s expense backup can be accessed from this Dropbox.

1           IPPs designate their billing and expense records as Highly Confidential pursuant to the  
2 terms of the Stipulated Protective Order (ECF No. 306). By providing access to their billing and  
3 expense records, IPPs and their counsel do not intend to waive any applicable privilege or  
4 objection.

5  
6 Dated: March 25, 2016

Respectfully submitted,

7 /s/ Mario N. Alioto

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